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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FORREST L. INGRAM, P.C.

Plaintiff,

v

WALTER E. ROCKWELL,

Defendant.

No. 09 C 1967

Judge Darrah

**FILED**  
DMK

AUG 25 2009  
AUG 25 2009  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**MOTION TO VACATE DEFAULT AND  
FOR LEAVE TO APPEAR AND TO PLEAD TO COMPLAINT**

Defendant Walter E. Rockwell, by his attorney Lawrence Seiwert moves the Court to vacate any and all defaults heretofore entered against him and for leave to file his appearance and answer instanter. In support of this motion, defendant states as follows.

1. Defendant Rockwell has been served with summons in this case.
2. On information and belief, he is in default and this case is set for prove up on August 27<sup>th</sup>, 2009.
3. Defendant Rockwell has just recently retained attorney Lawrence Seiwert to represent him in this case. A proposed answer is being prepared and shall be filed on August 27, 2009.
4. No prejudice will be incurred by plaintiff if defendant is allowed to appear and plead at this time.

WHEREFORE Defendant Walter E. Rockwell moves the Court to vacate any and all defaults heretofore entered against him and for leave to file his appearance and answer instant.

Respectfully Submitted,

Walter E. Rockwell

BY.

  
Lawrence Seiwert, His attorney

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